The American Waterways Operators

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Jennifer A. Carpenter
Executive Vice President & Chief Operating Officer

June 21, 2016

Ms. Marlene Dortch
Secretary, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Letter in Response to RM-11681
Petition for Rulemaking: Ligado's
Request to Allocate the 1675-1680
MHz Band for Terrestrial Mobile
Use Shared with Federal Use

Dear Ms. Dortch:

On behalf of the American Waterways Operators, thank you for the opportunity to comment on Ligado Networks' petition for rulemaking to allocate the 1675-1680 MHz band for terrestrial mobile use.

AWO is the national trade association for the inland and coastal tugboat, towboat and barge industry, a vital segment of America's transportation system. The fleet consists of more than 5,000 towing vessels and 27,000 dry and liquid cargo barges operating on the commercially navigable inland and intracoastal waterways; the Atlantic, Pacific and Gulf Coasts; the Great Lakes; and in ports and harbors all across the United States. Each year, towing vessels and barges safely, securely and efficiently move more than 800 million tons of critical cargoes that are the building blocks of U.S. economy. Tugboats also provide essential services, including shipdocking, tanker escort and bunkering, in ports and harbors across the U.S.

To safely navigate the nation's inland waterways, AWO members must have accurate, real-time information regarding water levels and flow rates, provided by river gauges. This river gauge data is conveyed via the National Oceanic and Atmospheric Administration's Geostationary Operational Environmental Satellite Data Collection System (GOES DCS), which is received in the 1675-1680 MHz radio spectrum. AWO members rely on NOAA's geostationary satellites for the real-time transmission of information that directly impacts their navigation assessments and their vessels' cargo carrying capacity and fuel utilization, and shipping costs for their customers.

This information is also communicated to the U.S. Army Corps of Engineers via the same L-band radio spectrum. Excessive flow or high water conditions may increase risks for vessels navigating near lock and dam structures. In some cases, stretches of waterways must be closed to barge traffic because of the potential for an allision or other incident. These important safety decisions rely on real-time information transmitted via NOAA's geostationary satellites.

AWO objects to any sharing of the 1675-1680 MHz radio spectrum that places the real-time and near-real-time river and coastal gauge information critical to the operations of our members and safety of our waterways at risk.

AWO also notes that major urban areas bordering the waterways would likely see a high density of cellular transmission towers under the Ligado proposal. Many of those same areas contain the district offices of the Corps, where local river gauge data is received and formulated into products that guide operations for our members and the Corps.

We urge the FCC to not move forward with this action unless adequate protection zones are extended to all relevant Corps sites. Protection zones are crucial to avoid disrupting vital information transmitted via NOAA's geostationary satellites. However, without more research on the impacts to our industry, AWO is not confident disruptive interference can be avoided. The sharing of the small amount of radio spectrum used to relay this critical maritime operational data must be weighed against the use of other bands where support of waterways safety and of such a major economic contributor as the tugboat, towboat and barge industry would not be a factor.

Thank you again for the opportunity to comment on this proceeding.

Sincerely,

Jennifer A. Carpenter

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